

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NHC LLC, a Florida limited liability
company,

Plaintiff,

v.

CENTAUR CONSTRUCTION COMPANY
INC., an Illinois corporation, SPIRO
TSAPARAS, and PETER ALEXOPOULOS,

Defendants.

No. 19-cv-06332

Honorable Matthew F. Kennelly

MOTION FOR ENTRY OF AGREED ORDER

Plaintiff/Judgment Creditor NHC LLC (“Judgment Creditor”) hereby moves for the entry of an Agreed Order (i) vacating the Conditional Judgment entered on July 30, 2025 against Third-Party Citation Respondent/Conditional Judgment Debtor William Edwin Connor II (“Connor”) and (ii) continuing the Alias Third-Party Citation to Discover Assets (the “Citation”) issued by Judgment Creditor to Connor to October 22, 2025 at 9:30 a.m. In support thereof, Judgment Creditor states as follows:

1. After a jury trial, judgment was entered against defendants Centaur Construction Company, Inc., Spiro Tsaparas, and Peter Alexopoulos (collectively, the “Judgment Debtors”) jointly and severally in the total amount of \$22,272,124.34 for fraud and breach of contract plus punitive damages against the defendants individually and in particular Tsaparas in the amount of \$1,500,000.00 (the “Judgment”). (Dkt. No. 228).

2. On or about June 30, 2025, Judgment Creditor caused this Court to issue the Citation to Connor concerning the assets of the Judgment Debtors. (Dkt. No. 752.)

3. The Citation commanded the production of documents on or before July 13, 2025

and set an initial return hearing date on July 16, 2025. (*Id.*)

4. Connor failed to produce documents in response to the Citation by July 13, 2025 and failed to appear for the initial return hearing date on July 16, 2025.

5. Accordingly, this Court entered Conditional Judgment against Connor on July 30, 2025. (Dkt. No. 758.)

6. A Summons to Confirm Conditional Judgment (the “Summons”) was issued to Connor on or about August 12, 2025, which required Connor to appear before the Court on September 23, 2025. (Dkt. No. 770.)

7. After issuance (but before service) of the Summons, counsel for Connor reached out to NHC and indicated Connor would promptly comply with the Citation.

8. Thereafter, Connor has made an initial production(s) of documents in compliance with the Citation and indicated he will comply with any remaining obligations under the Citation.

9. In light of Connor’s current cooperation/compliance in responding to the Citation, Judgment Creditor has agreed to vacate the Conditional Judgment against Connor.

10. In addition, Judgment Creditor and Connor agreed to continue the Citation so that any remaining obligations can be addressed.

11. Judgment Creditor appeared in-person in Court on September 23, 2025 and intended to make an oral motion to vacate the Conditional Judgment and extend the Citation to a later date. However, the Court advised that this matter had not been set on its docket and the Court was unable to call the case due to scheduling conflicts.

12. Accordingly, Judgment Creditor and Connor conferred and jointly drafted an agreed order vacating Conditional Judgment and continuing the Citation to a later date (the “Agreed Order”). A copy of the Agreed Order is attached hereto as **Exhibit 1**.¹

WHEREFORE, Judgment Creditor NHC LLC respectfully requests that this Court enter the Agreed Order which (i) vacates the Conditional Judgment entered by this Court against William

¹ Judgment Creditor will provide a copy of the Agreed Order in Microsoft Word version to the Court’s proposed order email address contemporaneously with the filing of this Motion.

Edwin Connor II and (2) continues the Citation issued to William Edwin Connor II to October 22, 2025 at 9:30 a.m., and further grant any additional relief to which NHC LLC may be entitled.

Dated: September 30, 2025

Respectfully submitted,

NHC LLC

By: /s/ Keeley A. Hanchon (Sawyer)
One of Its Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that, on September 30, 2025, a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court using the Court's CM/ECF system and thereby served electronically by the CM/ECF system on all counsel of record. I further certify that on September 30, 2025, I sent a true and correct copy of the foregoing via email to:

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Judgment Debtors

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Counsel for William E. Connor II

/s/ Keeley A. Hanchon (Sawyer)
An Attorney for NHC LLC